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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 7

YELLOW CORPORATION, et al., 1

Case No. 23-11069(CTG)

Re: D.I. 378 & 426

Debtors.

JOINDER OF HAWKEY TRANSPORTATION, INC. TO OBJECTION OF ORANGE BATAVIA I, LLC TO MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (I)(A) APPROVING BIDDING PROCEDURES FOR THE SALE OR SALES OF THE DEBTORS' ASSETS, ETC. [D.I. 426]

Hawkey Transportation, Inc. ("<u>Hawkey</u>"), creditor of certain of the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>"), by and through its undersigned counsel, respectfully submits this joinder to the *Objection of Orange Batavia I, LLC to Motion of the Debtors for Entry of an Order (I)(A) Approving Bidding Procedures for the Sale or Sales of the Debtors' Assets, Etc.* [D.I. 426] (the "<u>Objection</u>")<sup>2</sup>, solely to the extent set forth herein.

Specifically, Hawkey joins in the arguments set forth in ¶ 6-12, 14-19 of the Objection, incorporates these specific arguments in the Objection as if set forth herein, and respectfully requests that, for the reasons set forth therein, the Debtor's proposed bidding procedures set forth in the Sales Procedures Motion be revised to provide adequate time for parties to receive necessary information (including the proposed "Adequate Assurance Packages"), prepare and present objections to the Debtor's assumption and assignment of leases, if any, and arrange for witnesses to appear at any contested sale hearing.

<sup>&</sup>lt;sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at https://dm.epiq11.com/YellowCorporation. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

Dated: September 8, 2023

Wilmington, Delaware

## PASHMAN STEIN WALDER HAYDEN, P.C.

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